

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA Title III

Case No. 17-BK-3283-LTS

(Jointly Administered)

Re: ECF No. 23253

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as a representative of

PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

PROMESA Title III

Case No. 17-BK-4780-LTS

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO ELECTRIC POWER AUTHORITY,

Plaintiff/
Counterclaim-
Defendant,

PUERTO RICO FISCAL AGENCY AND FINANCIAL
ADVISORY AUTHORITY, THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS OF ALL
TITLE III DEBTORS, UNION DE TRABAJADORES DE
LA INDUSTRIA ELECTRICA Y RIEGO INC., AND
SISTEMA DE RETIRO DE LOS EMPLEADOS DE LA
AUTORIDAD DE ENERGIA ELECTRICA,

Plaintiff-
Intervenors,

v.

U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE,

Defendant/
Counterclaim-
Plaintiff,

THE AD HOC GROUP OF PREPA BONDHOLDERS,
ASSURED GUARANTY CORP., ASSURED
GUARANTY MUNICIPAL CORP., NATIONAL PUBLIC
FINANCE GUARANTEE CORPORATION, AND
SYNCORA GUARANTEE, INC.,

Defendant-
Intervenors/
Counterclaim-
Plaintiffs.

Adv. Proc. No. 19-00391-LTS

Re: ECF No. 119

PROMESA Title III

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as a representative of

PUERTO RICO ELECTRIC POWER AUTHORITY,

Movant,

v.

U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE,

Defendant/
Counterclaim-
Plaintiff,

THE AD HOC GROUP OF PREPA BONDHOLDERS,
ASSURED GUARANTY CORP., ASSURED
GUARANTY MUNICIPAL CORP., NATIONAL PUBLIC
FINANCE GUARANTEE CORPORATION, AND
SYNCORA GUARANTEE, INC.,

Defendant-Intervenors/
Counterclaim-Plaintiffs.

Adv. Proc. No. 19-00391-LTS

PROMESA Title III

**INFORMATIVE MOTION REGARDING ATTENDANCE
AT FEBRUARY 1-2, 2023, OMNIBUS HEARING AND ORAL ARGUMENT ON
MOTIONS FOR SUMMARY JUDGMENT**

To the Honorable United States District Judge Laura Taylor Swain:

The Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) through the undersigned counsel, hereby states and prays as follows:

1. The undersigned, appearing in this proceeding on behalf of AAFAF, hereby respectfully submit this informative motion in response to the Court’s order (the “Order”) entered on January 13, 2023 [ECF No. 23253].

2. Luis C. Marini-Biaggi and/or Carolina Velaz-Rivero of Marini Pietrantoni Muñiz LLC will appear, in person in the San Juan Courthouse,² at the February 1-2, 2023, hearing (the “Omnibus Hearing”), and seek to be heard to address questions and comments, if any, related to AAFAF’s February Status Report,³ reserving the right to be heard on any other matter presented to the Court and to respond to any statements made by any party in connection with the above captioned Title III cases to the extent it impacts the interests of AAFAF or the elected Government of Puerto Rico or any instrumentality thereof.

3. Peter Friedman, Maria J. DiConza, and/or Elizabeth McKeen of O’Melveny & Myers LLP will appear at the Hearing, in person, in the San Juan Courthouse, and reserve the right to be heard on the following matters:

- a. *Notice of Motion and Motion of the Financial Oversight and Management Board of Puerto Rico, as Title III Representative of the Puerto Rico Electric Power Authority, for Summary Judgment Pursuant to Bankruptcy Rule 7056* [Adv. Proc. 19-00391, ECF No. 62];
- b. *Memorandum in Support of Defendant/Counterclaim-Plaintiff’s and Intervenor-Defendants/Counterclaim-Plaintiffs’ Motion for Summary Judgment Against Plaintiffs/Counterclaim-Defendants* [Adv. Proc. 19-00391, ECF No. 67];
- c. Any other matter in connection with the *Order Regarding Oral Argument On Motions For Summary Judgment* [Adv. Proc. 19-00391, ECF No. 119].

4. Counsels Friedman, DiConza, and/or McKeen reserve the right to be heard on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned Title III cases to the extent it impacts the interests of AAFAF or the elected Government of Puerto Rico or any instrumentality thereof.

² Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767.

³ As directed in ¶ 9 of the Order.

5. In addition, counsels Gabriel L. Olivera and Ashley M. Pavel of O'Melveny & Myers LLP will observe the Hearing, in person, in the San Juan Courthouse.

6. Further, counsels Marini, Velaz, Friedman, DiConza, McKeen, Olivera and Pavel hereby submit their Party Appearance Cover Sheet as **Exhibit A** to this motion.

WHEREFORE, AAFAF respectfully requests that the Court take notice of the foregoing.

Dated: January 25, 2023
San Juan, Puerto Rico

Respectfully submitted,

O'MELVENY & MYERS LLP

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